

1 Steve Schulte (TX Bar No. 24051306)  
 2 *Appearance Pro Hac Vice*  
 3 John Raggio (CA Bar No. 338261)  
 4 Arati Furness (CA Bar No. 225435)  
**NACHAWATI LAW GROUP**  
 5 5489 Blair Road  
 6 Dallas, Texas 75231  
 Telephone: (214) 890-0711  
 Fax Number: (214) 890-0712  
 Email: [schulte@ntrial.com](mailto:schulte@ntrial.com)  
 Email: [jraggio@ntrial.com](mailto:jraggio@ntrial.com)  
 Email: [afurness@ntrial.com](mailto:afurness@ntrial.com)

7  
 8 *Counsel for Plaintiffs*

9 **UNITED STATES DISTRICT COURT**

10 **NORTHERN DISTRICT OF CALIFORNIA**

11 **SAN FRANCISCO DIVISION**

12  
 13 IN RE: UBER TECHNOLOGIES, INC.,  
 14 PASSENGER SEXUAL ASSAULT  
 15 LITIGATION

Case No. 3:23-md-03084-CRB

16 This Document Relates to:  
 17 *Jane Doe NLG (N.T.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07540-CRB*  
 18 *Jane Doe NLG (N.H.) v. Uber Technologies, Inc., et al., No 3:25-cv-08109-CRB*  
 19 *Jane Doe NLG 5 (A.H.) v. Uber Technologies, Inc., et al., No. 3:25-cv-08112-CRB*  
 20 *Jane Doe NLG (N.S.) v. Uber Technologies, Inc., et al., No. 3:25-cv-08186-CRB*  
 21 *Jane Doe NLG (D.S.) v. Uber Technologies, Inc., et al., No. 3:25-cv-08258-CRB*  
 22 *Jane Doe NLG 2 (J.C.) v. Uber Technologies, Inc., et al., No. 3:25-cv-08259-CRB*

23  
 24  
 25  
 26  
 27  
 28

**DECLARATION OF STEVEN S.  
 SCHULTE IN SUPPORT OF  
 NACHAWATI LAW GROUP  
 PLAINTIFFS' OPPOSITION TO  
 DEFENDANTS UBER TECHNOLOGIES,  
 INC., RASIER, LLC, AND RASIER-CA,  
 LLC'S MOTION TO DISMISS CASES  
 FOR FAILURE TO COMPLY WITH PTO**

5  
 Judge: Honorable Charles R. Breyer  
 Date: January 16, 2026  
 Time: 10:00 a.m.  
 Courtroom: 6 – 17th Floor

*Jane Doe NLG (M.U.) v. Uber Technologies, Inc., et al., No. 3:25-cv-08264-CRB*

*Jane Doe NLG 2 (V.F.) v. Uber Technologies, Inc., et al., No. 3:25-cv-08545-CRB*

*Jane Doe NLG (J.O.) v. Uber Technologies, Inc., et al., No. 3:25-cv-08567-CRB*

## **DECLARATION OF STEVEN S. SCHULTE**

I, Steven S. Schulte, declare as follows:

1. I am an attorney who is admitted *pro hac vice* to practice before this Court. I am a partner at the law firm Nachawati Law Group and counsel of record for the plaintiffs represented by Nachawati Law Group whose claims are the subject of Defendants' Motion to Dismiss. ECF No. 4490.
  2. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.
  3. This declaration is made in support of Nachawati Law Group Plaintiffs' Opposition to Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Motion to Dismiss Cases for Failure to Comply with Pretrial Order No. 5 ("PTO 5"). ECF No. 4490.
  4. Despite significant efforts, including numerous phone calls, emails, texts, letters, written communications, and full contact and address searches, our office has been unsuccessful in connecting with certain Plaintiffs as to the bona fide ride receipts or ride information sheets that are the subject of Defendants' Motion.
  5. Plaintiffs Jane Doe NLG 5 (A.H.), Jane Doe NLG 2 (J.C.), Jane Doe NLG 2 (V.F.), Jane Doe NLG (M.U.), and Jane Doe NLG (J.O.) have submitted and produced bona

1 fide ride receipts or ride information sheets as required by PTO 5, as of December 10,  
2 2025. Counsel would therefore dispute their inclusion on Uber's list of delinquencies,  
3 provided in their Motion, as well as respectfully request for their exclusion on any  
4 future entry of dismissal by the Court.

5 Executed on December 10, 2025, in Dallas, Texas.  
6

7 **NACHAWATI LAW GROUP**

8 /s/ Steven S. Schulte  
9 Steven S. Schulte (TX SBN 24051306)

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28